

FINANCIAL



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Sending Medical Waste Via Mail Can it Reduce Your Disposal Costs?

Jan Harris, Sharps, Inc.

One of the most confusing topics for the dental office is medical waste disposal. The Centers for Disease Control and Prevention estimates that less than 10 percent of waste from a dental office is actually regulated medical waste; the majority of that is sharps. Trash disposed of as medical waste costs Texas dentists thousands of dollars each year.

Medical waste is regulated by a variety of agencies, including the Occupational Safety and Health Administration (OSHA), Texas Commission on Environmental Quality (TCEQ), and for mail disposal, the United States Postal Service (USPS). The regulation of medical waste begins with OSHA, which defines and regulates medical waste inside the dental office. TCEQ defines what waste must be segregated from regular trash and receive special treatment as medical waste. OSHA, and certainly TCEQ, would consider most dental office red-bag waste to be trash.

Defining Medical Waste – OSHA

The intention of defining regulated medical waste is to protect employees from exposure. When determining if waste is regulated medical waste, the amount of contamination is the key. Some offices believe that medical waste includes items that have been merely "contaminated" with visible blood or saliva. According to OSHA, "contaminated" items are not "regulated" unless they meet the criteria listed below:

- Liquid or semi-liquid blood; or other potentially infectious materials (OPIM), such as saliva in a dental procedure
- Contaminated items that would release blood or OPIM in a liquid or semi-liquid state if compressed
- Items that are caked with dried blood or OPIM and are capable of releasing these materials during handling
- Pathological and microbiological wastes containing blood or OPIM
- Contaminated sharps

Defining of Medical Waste – TCEQ

The TCEQ requires special treatment and disposal of certain wastes in order to protect the public and the environment. Except for sharps, TCEQ does not define medical waste as strictly as OSHA does. Items that must be placed in containers labeled with the biohazard symbol, in order to comply with OSHA, are not considered regulated by TCEQ, unless they are listed below:

- Sharps such as needles, IM syringes with needles attached, suture needles
- Contaminated carpules, endo files, scalpel blades, microscope slides, dental wires, contaminated sharp instruments, contaminated broken glass
- Bulk human blood
- Path and micro waste

ADVANTAGES

Complying with Both OSHA and TCEQ

How can Texas dental offices comply with both OSHA and TCEQ, and minimize their medical waste volume and costs? The key is in proper segregation.

- First, replace all red bags with black bags.
- Next, place large, visible biohazard labels on all trash receptacles in clinical areas, i.e., ops and sterilization (where red bags once were).

All trash can be placed into these containers, including medical waste, such as blood or saliva-soaked cotton rolls. The biohazard label assures compliance with OSHA by warning employees to handle these containers with precaution. When the black bag is full, it can be pulled and placed into the regular trash dumpster, as this waste does not meet TCEQ's definition of medical waste. This means of "waste segregation and minimization" can result in substantial savings for the dental office.

Of course, sharps are always placed into sharps containers and disposed of as regulated medical waste.

Considering Your Disposal Options

Once the office has reduced what it considers medical waste, and has an accurate idea of the volume of medical waste it generates, the appropriate disposal method can be considered.

Traditionally, medical waste pickup services have been used by Texas dentists. Pickup services

are often very costly, and because the typical box is large, it tends to fill up with items that are not truly regulated medical waste. Disposing of "trash" as medical waste is expensive.

Medical waste disposal by mail, a method that's been utilized for more than 10 years, is growing in popularity among dental offices. Once medical waste is defined appropriately, most offices reduce their medical waste substantially. For the small-quantity generator of medical waste in Texas, this method may be the perfect solution. SHARPS Disposal by Mail System®, for example, partners with the USPS, and only requires waste disposal when the container is full, a method that saves money. It includes a sharps container designed to be mailed and a pre-paid return-by-mail package. All costs — the container, packaging, return postage, and destruction — are included in the price. Systems are purchased on an as-needed basis, without required contracts, and proof of destruction is provided.

Treatment by encapsulation is another option that is sometimes used by Texas dentists. TCEQ requires that encapsulation material completely fill the container and encase the sharps. If material is poured on top of the sharps, it usually creates a cap over the sharps container opening — failing to encase the entire contents. TCEQ also requires proof that the container and solidified contents can withstand an applied pressure of 40 pounds of pressure per square inch (psi) without disintegration when compacted by the garbage truck. In addition, this method can only be

used for sharps, not for teeth or expired medications. This method is considered on-site treatment, and provides no third-party verification of proper disposal, as disposal-by-mail or pickup services do.

Documentation

Generators of medical waste have a cradle-to-grave liability for that waste. Consequently, it is important to track the waste through its destruction. Regardless of the type of disposal, one must document how, who, when, where, and how much waste was disposed of. Texas requires generators of medical waste to maintain medical waste disposal documentation for 3 years. Proving medical waste has been properly disposed is not only required; it is good risk management.

The Bottom Line

Medical waste costs can be reduced by properly segregating waste and selecting a compliant and cost-effective disposal method. Dental practices must become and remain familiar with federal as well as Texas regulations. Having solutions ready and employees trained on those solutions can lead to proper medical waste management — the key to precluding disease transmission, fines, and lawsuits.

Sharps, Inc.'s Disposal by Mail Systems® are endorsed by TDA Financial Services. For more information, please call (800) 772-5657. For information regarding other TDA Financial Services-endorsed programs, visit www.tdafsi.com, or call (512) 443-3675.